

1 Joseph R. Saveri (*pro hac vice*)
JOSEPH SAVERI LAW FIRM, INC.
2 555 Montgomery Street, Suite 1200
San Francisco, California 94111
3 Telephone: (415) 500-6800
Facsimile: (415) 395-9940
4 jsaveri@saverilawfirm.com

5 Richard A. Koffman (*pro hac vice*)
COHEN MILSTEIN SELLERS & TOLL, PLLC
6 1100 New York Ave., N.W., Suite 500, East Tower
Washington, DC 20005
7 Telephone: (202) 408-4600
Facsimile: (202) 408 4699
8 rkoffman@cohenmilstein.com

9 Eric L. Cramer (*pro hac vice*)
BERGER & MONTAGUE, P.C.
10 1622 Locust Street
Philadelphia, PA 19103
11 Telephone: (215) 875-3000
Facsimile: (215) 875-4604
12 ecramer@bm.net

13 *Co-lead Counsel for Individual and Representative Plaintiffs*
Cung Le, Nathan Quarry, and Jon Fitch, Brandon
14 *Vera, Luis Javier Vazquez, and Kyle Kingsbury*
15 [Additional Counsel Listed on Signature Page]

16 UNITED STATES DISTRICT COURT

17 DISTRICT OF NEVADA

18
19 Cung Le, Nathan Quarry, Jon Fitch, Brandon Vera,
20 Luis Javier Vazquez, and Kyle Kingsbury, on
behalf of themselves and all others similarly
situated,

21 Plaintiffs,

22 v.

23 Zuffa, LLC, d/b/a Ultimate Fighting
24 Championship and UFC,

25 Defendant.

Case No. 2:15-cv-01045-RFB-(PAL)

**[PROPOSED] STIPULATED ORDER
RE: EXTENSION OF DEADLINE FOR
EXPERT REPORTS**

26
27 Plaintiffs Cung Le, Nathan Quarry, Jon Fitch, Brandon Vera, Luis Javier Vazquez, and
28 Kyle Kingsbury (“Plaintiffs”) and Defendant Zuffa, LLC (“Zuffa”) (Zuffa and Plaintiffs

1 collectively, “the Parties”) having met and conferred on the issues addressed herein, respectfully
2 submit the following [Proposed] Stipulated Order re: Extension of Deadline for Expert Reports:

3 WHEREAS, the Court issued the current Discovery Plan and Scheduling Order on
4 October 14, 2016 (ECF No. 311), under which the deadline for Plaintiffs’ opening expert class
5 and merits reports is May 30, 2017, the deadline for Zuffa’s opposing class and merits expert
6 reports is July 24, 2017, and the deadline for Plaintiffs’ rebuttal class and merits expert reports is
7 September 5, 2017; and,

8 WHEREAS, Plaintiffs have asserted that several motions are currently pending whose
9 outcomes could materially affect Plaintiffs’ experts’ opening reports, including:

- 10 • **Plaintiffs’ Motion to Challenge Work Product Designation**, ECF No. 282,
11 filed August 31, 2016;
- 12 • **Plaintiffs’ Motion for Extension of Discovery Deadline and Case**
13 **Management Schedule**, ECF No. 363, filed March 21, 2017;
- 14 • **Non-Party Bellator Sport Worldwide, LLC’s Motion to Quash or Modify**
15 **Subpoenas**, Case No. 2:17-cv-00849-RFB-PAL, filed in the Central District of
16 California on February 22, 2017 and transferred to the District of Nevada on
17 March 17, 2017; and,

18 WHEREAS, the Court has scheduled a hearing on Plaintiffs’ motion for extension of
19 discovery deadlines (ECF No. 363) and request for status conference (ECF No. 393) for June 1,
20 2017; and,

21 WHEREAS, the June 1 hearing would be two days after Plaintiffs’ experts’ opening
22 reports are due; and,

23 WHEREAS, Plaintiffs have asked the Court to extend the expert reports deadline by at
24 least sixty days (ECF No. 393 at 4); and,

25 WHEREAS, Zuffa has previously proposed to extend the expert reports deadline by 30
26 days or the later of the Court’s ruling on Plaintiffs’ Motion to Challenge Work Product
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Designation or Plaintiffs' motion to compel log of Dana White's cell phone communications (ECF No. 401 at 1);

WHEREAS, while Plaintiffs believe that the expert and other deadlines should be vacated pending further order of the Court, to avoid the uncertainties and inefficiencies that would result absent an agreement, and without prejudice to Plaintiffs' ability to seek additional time depending upon whether Plaintiffs are able to complete additional fact discovery as agreed by the parties and/or allowed by the Court, Plaintiffs have agreed to the deadlines set forth herein pending further order of the Court at the June 1 status conference; and,

WHEREAS, the Parties, having met and conferred on May 19, 2017, have agreed to the terms set forth in this Proposed Stipulated Order.

NOW THEREFORE, having considered the representations of the Parties, the Court hereby ORDERS:

The deadlines for the Parties' expert reports, including Plaintiffs' opening class and merits expert reports, previously set forth in the Court's Order dated October 14, 2016 (ECF No. 311), are hereby extended as follows:

Plaintiffs' Opening Expert Reports (class and merits)	July 31, 2017 or 30 days following the Court's ruling on Plaintiffs' pending motions, ECF Nos. 282 and 397, whichever is later,
Last Day to Depose Experts Concerning Opening Reports	August 31, 2017 or 60 days following the Court's ruling on Plaintiffs' pending motions, ECF Nos. 282 and 397, whichever is later
Opposition Expert Reports	September 29, 2017 or 90 days following the Court's ruling on Plaintiffs' pending motions, ECF Nos. 282 and 397
Last Day to Depose Opposition Experts	October 30, 2017 or 120 days following the Court's ruling on Plaintiffs' pending motions, ECF Nos. 282 and 397
Reply Expert Reports	November 13, 2017 or 134 days following the Court's ruling on Plaintiffs' pending motions, ECF Nos. 282 and 397

1 IT IS SO ORDERED.

2
3 DATED: May 23, 2017


United States Magistrate Judge Peggy A. Leen

5 DATED: May 19, 2017

/s/ Michael Dell'Angelo

Michael Dell'Angelo

7 Eric L. Cramer (*pro hac vice*)
8 Michael Dell'Angelo (*pro hac vice*)
9 Patrick F. Madden (*pro hac vice*)
10 BERGER & MONTAGUE, P.C.
11 1622 Locust Street
12 Philadelphia, PA 19103
13 Telephone: (215) 875-3000/Fax: (215) 875-4604
14 ecramer@bm.net
15 mdellangelo@bm.net
16 pmadden@bm.net

17 JOSEPH SAVERI LAW FIRM, INC.
18 Joseph R. Saveri (*pro hac vice*)
19 Joshua P. Davis (*pro hac vice*)
20 Matthew Weiler (*pro hac vice*)
21 Kevin E. Rayhill (*pro hac vice*)
22 555 Montgomery Street, Suite 1210
23 San Francisco, California 94111
24 Telephone: (415) 500-6800/Fax: (415) 395-9940
25 jsaveri@saverilawfirm.com
26 jdavis@saverilawfirm.com
27 mweiler@saverilawfirm.com
28 krayhill@saverilawfirm.com

COHEN MILSTEIN SELLERS & TOLL, PLLC
Benjamin D. Brown (*pro hac vice*)
Richard A. Koffman (*pro hac vice*)
Daniel Silverman (*pro hac vice*)
1100 New York Ave., N.W., Ste. 500, East Tower
Washington, DC 20005
Telephone: (202) 408-4600/Fax: (202) 408 4699
bbrown@cohenmilstein.com
rkoffman@cohenmilstein.com
dsilverman@cohenmilstein.com

*Co-Lead Counsel for Individual and Representative
Plaintiffs Cung Le, Nathan Quarry, and Jon Fitch,
Brandon Vera, Luis Javier Vazquez, and Kyle
Kingsbury*

WOLF RIFKIN SHAPIRO SCHULMAN &
RABKIN, LLP
Don Springmeyer
Nevada State Bar No. 1021
Bradley Schrager
Nevada State Bar No. 10217

1 Daniel Bravo
2 Nevada State Bar No. 13078
3 3556 East Russell Road, Second Floor
4 Las Vegas, NV 89120
5 Telephone: (702) 341-5200
6 Fax: (702) 341-5300

*Liaison Counsel for Individual and Representative
Plaintiffs Cung Le, Nathan Quarry, and Jon Fitch,
Brandon Vera, Luis Javier Vazquez, and Kyle
Kingsbury*

7 WARNER ANGLE HALLAM JACKSON &
8 FORMANEK PLC

9 Robert C. Maysey (*pro hac vice*)
10 Jerome K. Elwell (*pro hac vice*)
11 2555 E. Camelback Road, Suite 800
12 Phoenix, AZ 85016
13 Telephone: (602) 264-7101/Fax: (602) 234-0419
14 rmaysey@warnerangle.com
15 jelwell@warnerangle.com

16 LAW OFFICE OF FREDERICK S. SCHWARTZ

17 Frederick S. Schwartz (*pro hac vice*)
18 15303 Ventura Boulevard, #1040
19 Sherman Oaks, CA 91403
20 Telephone: (818) 986-2407/Fax: (818) 995-4124
21 fred@fredschwartzlaw.com

22 SPECTOR ROSEMAN KODROFF &
23 WILLIS, P.C.

24 Eugene A. Spector (*pro hac vice* pending)
25 Jeffrey J. Corrigan (*pro hac vice*)
26 Jay S. Cohen (*pro hac vice*)
27 William G. Caldes (*pro hac vice*)
28 1818 Market Street – Suite 2500
Philadelphia, PA 19103
Telephone: (215) 496-0300/Fax: (215) 496-6611
espector@srkw-law.com
jcorrigan@srkw-law.com
jcohen@srkw-law.com
wcaldes@srkw-law.com

*Counsel for Individual and Representative Plaintiffs
Cung Le, Nathan Quarry, Jon Fitch, Luis Javier
Vazquez, Brandon Vera and Kyle Kingsbury*

1 DATED: May 19, 2017

/s/ Stacey Grigsby

2
3 WILLIAM A. ISAACSON (*Pro hac vice*)
(wisaacson@bsflp.com)
4 STACEY K. GRIGSBY (*Pro hac vice*)
(sgrigsby@bsflp.com)
5 NICHOLAS WIDNELL (*Pro hac vice*)
(nwidnell@bsflp.com)
6 BOIES SCHILLER FLEXNER LLP
1401 New York Avenue, NW
7 Washington, DC 20005
Tel: (202) 237-2727; Fax: (202) 237-6131

8 RICHARD J. POCKER #3568
(rpocker@bsflp.com)
9 BOIES SCHILLER FLEXNER LLP
300 South Fourth Street, Suite 800
10 Las Vegas, NV 89101
Tel: (702) 382-7300; Fax: (702) 382-2755

11 DONALD J. CAMPBELL #1216
(djc@campbellandwilliams.com)
12 J. COLBY WILLIAMS #5549
(jcw@campbellandwilliams.com)
13 CAMPBELL & WILLIAMS
700 South 7th Street
14 Las Vegas, Nevada 89101
Tel: (702) 382-5222; Fax: (702) 382-0540

15 *Attorneys for Defendant Zuffa, LLC, d/b/a*
16 *Ultimate Fighting Championship and UFC*
17
18
19
20
21
22
23
24
25
26
27
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